

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: DIISOCYANATES ANTITRUST
LITIGATION

Master Docket Misc. No. 18-1001

MDL No. 2862

This Document Relates to ALL ACTIONS

**PLAINTIFFS' MOTION TO COMPEL
DEFENDANTS PRE-TAR APPLICATION OF DISPUTED SEARCH TERMS**

TO ALL PARTIES AND COUNSEL OF RECORD:

Pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying Memorandum of Law, Plaintiffs hereby move to compel Defendants to include in their TAR review set those documents identified by the search terms in Exhibit A to the Declaration of Sarah R. LaFreniere in Support of Plaintiffs' Motion to Compel Pre-Tar Application of Search Terms, and in Opposition to Defendants' Motion for a Protective Order (ECF 591).

A proposed Order is attached.

Respectfully submitted,

Dated: December 15, 2021

s/ William Pietragallo, II
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